

Exhibit 4

Declaration of Roberto Claros

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA

(Alexandria Division)

ROBERTO CLAROS et al.,

Plaintiffs,

v.

SWEET HOME IMPROVEMENTS, INC.,
et al.,

Defendants

Case No: 1:16-CV-344-AJT-MSN

Hearing Date: October 14, 2016
10:00 a.m.

Declaration of Roberto Claros

1. My name is Roberto Claros. I am over 18 years of age and am competent to make this declaration based on my personal knowledge. I am a resident of Fairfax County, Virginia.
2. I worked for the Defendants from around May 3 to around September 11, 2015.
3. My brother, Plaintiff José Claros, helped me get a job with Sweet Home. He had already been working at the company for two or three weeks and speaks good English, which I do not. So he talked to the owner, Mr. Koo, and Mr. Koo agreed to give me a job there, performing construction and remodeling work.
4. Mr. Koo hired me at a rate of \$18 per hour.
5. After I was hired, my brother José Claros and I worked together as a team. I always worked beside José Claros. Sweet Home had many projects going on in Northern Virginia, and we worked for the company on a full-time basis throughout the period of our employment, typically working well over 40 hours each week.

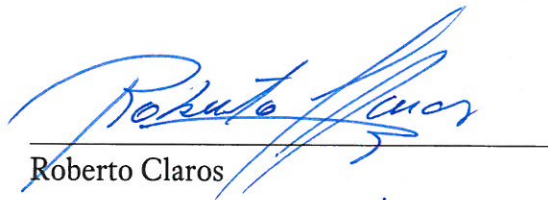
6. Our work for Sweet Home included carpentry, painting, hanging drywall, and installing insulation.
7. I did not hire, pay, or supervise workers of my own.
8. Mr. Koo assigned us our projects and tasks each day. Mr. Koo communicated with José Claros multiple times every day, and José would pass Mr. Koo's instructions on to me in Spanish because, unlike him, I do not speak English.
9. Initially, things were fine: José Claros submitted both his and my hours to Defendants, and Defendants would pay each of us according to our hourly rate. Defendants paid José and me separately; he was not the one who paid me.
10. I received my pay from Mr. Koo directly, as check in hand. The checks had my name on them. Defendants produced photocopies of carbon copies of some of these checks in discovery, a sample of which is attached to this declaration as Exhibit 4-A.
11. These hourly wages were the only form of compensation I received for the work I performed.
12. At no time during my employment did Defendants pay me an overtime premium for any hours that I worked beyond 40 in a given week.
13. Defendants did not pay me any compensation for four weeks of work, comprising approximately the month of August 2015.
14. During this period, I estimate that I worked for Defendants about nine or ten hours a day Monday through Friday, plus about three additional hours each week. I also worked two Saturdays and two Sundays during this period, for about seven or eight hours each day, though I do not remember the precise weeks that this weekend work occurred.
15. I was also supposed to receive a 30-minute break per day. However, I was frequently unable to take my break because I would have too much work to do that day.
16. After the fourth week of non-payment, I told Mr. Koo that I intended to quit. Mr. Koo convinced me to stay long enough to wrap up the Sweet Home projects that I had already started. Mr. Koo offered to pay me \$150 per day for 40 hours of work per week: 8 hours a

day, Monday through Friday. I accepted the offer. But for this inducement, I would have quit right away.

17. Mr. Koo paid me properly for one week under this arrangement, from approximately August 31 to September 4, 2015. But my pay for the second week, approximately September 7–11, 2015, was short \$600 (four days' pay). When Mr. Koo had not fixed the situation by the beginning of the following week, I quit for good.

I declare under penalty of perjury that the foregoing is true and correct.

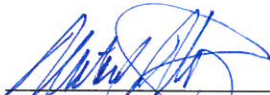
Executed on September 23, 2016



Roberto Claros

Interpreter's Certification

I, Nicholas Marritz, certify that I am fluent in English and Spanish, and that I interpreted the foregoing Declaration of Roberto Claros to the declarant faithfully and accurately, to the best of my ability.



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September 23, 2016